

REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: August 22, 2014

ANALYST: Kevin Fortkiewicz

I. COMMITTEE:

IMMIGRATION911, LLC
C00495259
Stanley P. Dull, Treasurer
P.O. Box 10010
Manassas, VA 20108

II. RELEVANT STATUTE:

2 U.S.C. § 434(b)(2) and (4)
11 CFR § 104.3(a) and (b)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

IMMIGRATION911, LLC ("the Committee") amended its 2011 Year-End and 2012 April Quarterly Reports to disclose additional receipts of \$20,759.60 and additional disbursements of \$103,886.08, which were not disclosed in the original reports (Attachment 2).

2011 Year-End Report

On January 26, 2012, the Committee filed the original 2011 Year-End Report covering the period August 1, 2011 through December 31, 2011². The report disclosed \$0.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals), \$320.00 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals), and \$132,101.91 in receipts on Line 13 (All Loans Received) of the Detailed Summary Page (Image 12970137818). The report also disclosed \$0.00 in disbursements on Line 21(b) (Other Federal Operating Expenditures) of the Detailed Summary Page (Image 12970137819).

² The Committee filed the original 2011 Year-End Report with incorrect coverage dates (Image 12970137816). However, subsequent reports disclose the correct coverage dates of July 1, 2011 through December 31, 2011.

On April 16, 2012, Szilvia Vukovics, a Committee Representative, called with questions regarding amending the 2011 Year-End Report. Ms. Vukovics wanted to know if operating expenses needed to be reported by the Committee and the Reports Analysis Division (RAD) Analyst explained that if expenses were paid from the federal account, they should be reported (Attachment 5).

On May 30, 2012, the Committee filed an Amended 2011 Year-End Report. The report disclosed \$1,000.00 in receipts on Line 11(a)(i), \$973.00 in receipts on Line 11(a)(ii), and \$151,101.91 in receipts on Line 13 of the Detailed Summary Page, a total increase of \$20,653.00 from the original report (Image 12971256070, Attachment 3). The report also disclosed \$96,551.33 in disbursements on Line 21(b) of the Detailed Summary Page, a total increase of \$96,551.33 from the original report (Image 12971256071, Attachment 4).

On August 3, 2012, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2011 Year-End Report, received May 30, 2012. Among other items, the RAI requested clarification regarding the increase receipts and disbursements that were not disclosed on the original report (Images 12330010207).

On February 13, 2013, the Committee filed an Amended 2011 Year-End Report. The Report disclosed no change in the total amount of receipts and disbursements from the previous amendment (Image 13960821048).

2012 April Quarterly Report

On April 17, 2012, the Committee filed the original 2012 April Quarterly Report covering January 1, 2012 through March 31, 2012. The report disclosed \$856.00 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals) (Image 12971114615). The report also disclosed \$38,110.65 in disbursements on Line 21(b) (Other Federal Operating Expenditures) of the Detailed Summary Page (Image 12971114616).

On May 30, 2012, the Committee filed an Amended 2012 April Quarterly Report. The report disclosed \$962.60 in receipts on Line 11(a)(ii) of the Detailed Summary Page, a total increase of \$106.60 from the original report (Image 12971256038, Attachment 3). The report also disclosed \$45,445.40 in disbursements on Line 21(b) of the Detailed Summary Page, a total increase of \$7,334.75 from the original report (Image 12971256039, Attachment 4).

On February 13, 2013, the Committee filed an Amended 2012 April Quarterly Report. The Report disclosed no change in the total amount of receipts and disbursements from the previous amendment (Images 13960821149).

On March 7, 2013, an RAI was sent to the Committee referencing the Amended 2012 April Quarterly Report, received May 30, 2012. The RAI requested clarification regarding the increase in receipts and disbursements that were not disclosed on the original filing (Image 13330026698).

On April 23, 2013, the RAD Analyst called Committee Treasurer, Stanley Dull, to discuss the increased activity disclosed on the Committee's amended reports that may be referred for further action to another office at the Commission. Mr. Dull advised the Analyst to speak with Szilvia Vukovics, who is in charge of filing the reports. Ms. Vukovics stated that she did not receive any letters regarding increase in receipts and disbursements disclosed on the Amended 2011 Year-End and Amended 2012 April Quarterly Reports, received May 30, 2012 and asked to call the Analyst back at a later time (Attachment 5).

On April 29, 2013, the RAD Analyst spoke to Ms. Vukovics, who explained that the Committee did not have much activity and was in the process of shutting down. The Analyst explained that the Committee had not responded to several RFAs sent to them and further stated that one of the issues referenced in the RFAs may be referred for further action to another office at the Commission. Ms. Vukovics explained that she had not received any letters and confirmed that the email address used to send the RFAs was accurate. However, Ms. Vukovics stated that it appears the individual responsible for checking the official email address of record had not forwarded the letters to her so she was unaware of the issues in question. The Analyst went through all of RFAs that had been sent to the Committee recently, including the increase in activity that occurred on the Amended 2011 Year-End and 2012 April Quarterly Reports, received May 30, 2012. The Analyst further explained that due to the amount of increased activity disclosed on the amended reports, the Committee may be referred for further action to another office at the Commission and may not be able to terminate at this time. Ms. Vukovics stated that she would address these issues (Attachment 5).

To date, no further communications have been received from the Committee regarding this matter.

O-Index

8/22/2014 11:10 AM

O-Index (2013-2014)

Cmte. ID: C00495259 Cmte. Name: IMMIGRATION911, LLC

Treasurer Name: STANLEY P DULL Address: PO BOX 10010, MANASSAS, VA 20108

Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	AI	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
RQ2	MY	N	5/6/2014	2	14330051489	1/1/2013	6/30/2013	5/6/2014	-	-	-	-	-	-	-
RQ7	MY	N	8/22/2013	2	13330036668	1/1/2013	6/30/2013	8/22/2013	-	-	-	-	-	-	-
RQ7	YE	N	2/26/2014	2	14330045443	7/1/2013	12/31/2013	2/26/2014	-	-	-	-	-	-	-
RQ2	YE	N	5/6/2014	2	14330051491	7/1/2013	12/31/2013	5/6/2014	-	-	-	-	-	-	-
RQ2	Q1	N	5/6/2014	2	14330051493	1/1/2014	3/31/2014	5/6/2014	-	-	-	-	-	-	-
RQ7	Q2	N	8/4/2014	2	14330056910	4/1/2014	6/30/2014	8/4/2014	-	-	-	-	-	-	-
F3XN	MY	N	4/10/2014	49	14960635245	1/1/2013	6/30/2013	-	\$38,305	\$22,700	\$11,977	\$49,027	-	\$292,801	\$292,801
F3XN	YE	N	4/10/2014	50	14960635991	7/1/2013	12/31/2013	-	\$49,027	\$2,000	\$3,942	\$47,085	-	\$294,801	\$294,801
F3XN	Q1	N	4/10/2014	50	14960636171	1/1/2014	3/31/2014	-	\$47,085	\$500	\$670	\$46,915	-	\$295,301	\$295,301
Totals										\$25,200	\$16,590				

O-Index (2011-2012)

Cmte. ID: C00495259 Cmte. Name: IMMIGRATION911, LLC

Treasurer Name: STANLEY P DULL Address: PO BOX 10010, MANASSAS, VA 20108

Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	AI	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			5/24/2012	1	12971251326				-	-	-	-	-	-	-
RQ1		N	5/13/2011	2	11330009347			5/13/2011	-	-	-	-	-	-	-
RQ2	MY	A	3/7/2013	2	13330026690	1/1/2011	6/30/2011	3/7/2013	-	-	-	-	-	-	-
RQ7	YE	N	2/16/2012	2	12030743056	7/1/2011	7/31/2011	2/16/2012	-	-	-	-	-	-	-
RQ2	YE	A	3/7/2013	2	13330026692	7/1/2011	12/31/2011	3/7/2013	-	-	-	-	-	-	-
RQ2	YE	N	3/21/2012	3	12330004281	8/1/2011	12/31/2011	3/21/2012	-	-	-	-	-	-	-
RQ2	YE	A	8/3/2012	3	12330010207	7/1/2011	12/31/2011	8/3/2012	-	-	-	-	-	-	-
RQ2	Q1	A	3/7/2013	3	13330026698	1/1/2012	3/31/2012	3/7/2013	-	-	-	-	-	-	-
RQ2	Q1	A	8/3/2012	2	12330010212	1/1/2012	3/31/2012	8/3/2012	-	-	-	-	-	-	-
RQ2	Q2	A	3/7/2013	2	13330026694	4/1/2012	6/30/2012	3/7/2013	-	-	-	-	-	-	-
RQ7	Q3	N	10/31/2012	2	12030943618	7/1/2012	9/30/2012	10/31/2012	-	-	-	-	-	-	-
RQ7	30G	N	12/14/2012	2	12030983468	10/1/2012	11/26/2012	12/14/2012	-	-	-	-	-	-	-
RQ2	YE	N	3/7/2013	2	13330026696	10/1/2012	12/31/2012	3/7/2013	-	-	-	-	-	-	-
F3XN	MY	N	7/31/2011	5	11931532804	1/1/2011	6/30/2011	-	\$0	\$484	\$0	\$484	-	\$0	\$0
F3XA	MY	A	2/13/2013	9	13960820332	1/1/2011	6/30/2011	-	\$0	\$3,559	\$30,261	(\$26,702)	-	\$3,000	\$3,000
F3XN	YE	N	1/26/2012	13	12970137816	8/1/2011	12/31/2011	-	\$0	\$132,421	\$1,000	\$131,421	-	\$132,101	\$132,101
F3XA	YE	A	5/30/2012	28	12971256068	7/1/2011	12/31/2011	-	(\$26,702)	\$153,074	\$97,551	\$28,821	-	\$154,101	\$154,101
F3XA	YE	A	2/13/2013	29	13960821048	7/1/2011	12/31/2011	-	(\$26,702)	\$153,074	\$97,551	\$28,821	-	\$308,203	\$154,101
F3XN	Q1	N	4/17/2012	25	12971114613	1/1/2012	3/31/2012	-	\$132,774	\$47,631	\$38,110	\$142,295	-	\$178,601	\$178,601
F3XA	Q1	A	5/30/2012	30	12971256036	1/1/2012	3/31/2012	-	\$28,821	\$47,712	\$45,445	\$31,088	-	\$247,101	\$200,601
F3XA	Q1	A	2/13/2013	31	13960821149	1/1/2012	3/31/2012	-	\$28,821	\$47,712	\$45,445	\$31,088	-	\$366,703	\$200,601
F3XN	Q2	N	7/19/2012	32	12952529960	4/1/2012	6/30/2012	-	\$31,088	\$26,966	\$23,891	\$34,163	-	\$225,601	\$225,601
F3XA	Q2	A	2/13/2013	32	13960820555	4/1/2012	6/30/2012	-	\$31,088	\$26,966	\$23,891	\$34,163	-	\$416,703	\$225,601
F3XN	Q3	N	2/13/2013	52	13960820648	7/1/2012	9/30/2012	-	\$34,163	\$27,753	\$24,400	\$37,516	-	\$251,101	\$251,101
F3XN	YE	N	2/13/2013	48	13960820700	10/1/2012	12/31/2012	-	\$37,516	\$20,535	\$19,745	\$38,305	-	\$270,101	\$270,101

Attachment I

O-Index

8/22/2014 11:10 AM

F3XA	YE	A	8/16/2013	48	13964524999	10/1/2012	12/31/2012		\$37,516	\$20,535	\$19,745	\$38,305	-	\$270,101	\$270,101
F1		N	4/15/2011	5	11030592821				-	-	-	-	-	-	-
F1		A	5/31/2011	4	11030611732										
Totals									\$279,601	\$241,296					

O-Index (2009-2010)

Cmte. ID: C00495259 Cmte. Name: IMMIGRATION911, LLC

Treasurer Name: STANLEY P DULL Address: PO BOX 10010, MANASSAS, VA 20108

Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER

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No records were found for this cycle.

Attachment 1

IMMIGRATION911, LLC (C00495259)

Overview of Additional Receipts

Report Name	Total Additional Receipts	Line Number(s)
2011 Year-End Report/Amended 2011 Year-End Report, received 5/30/12	\$20,653.00	11(a)(i), 11(a)(ii), 13
2012 April Quarterly Report/Amended 2012 April Quarterly Report, received 5/30/12	\$106.60	11(a)(ii)
Total Additional Receipts	\$20,759.60	

Overview of Additional Disbursements

Report Name	Total Additional Disbursements	Line Number(s)
2011 Year-End Report/Amended 2011 Year-End Report, received 5/30/12	\$96,551.33	21(b)
2012 April Quarterly Report/Amended 2012 April Quarterly Report, received 5/30/12	\$7,334.75	21(b)
Total Additional Disbursements	\$103,886.08	

Total Increase in Activity on Amended Reports: \$124,645.68

IMMIGRATION911, LLC (C00495259)

Additional Receipts by Line Number

2011 Year-End Report/Amended 2011 Year-End Report

Report Line	2011 Year-End Report (Image 12970137818)	Amended 2011 Year- End Report, received 5/30/12 (Image 12971256070)	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$0.00	\$1,000.00	\$1,000.00
Line 11(a)(ii): Unitemized Contributions from Individuals	\$320.00	\$973.00	\$653.00
Line 13: All Loans Received	\$132,101.91	\$151,101.91	\$19,000.00
Total Variance:			\$20,653.00

2012 April Quarterly Report/Amended 2012 April Quarterly Report

Report Line	2012 April Quarterly Report (Image 12971114615)	Amended 2012 April Quarterly Report, received 5/30/12 (Image 12971256038)	Variance Amount
Line 11(a)(ii): Unitemized Contributions from Individuals	\$856.00	\$962.60	\$106.60
Total Variance:			\$106.60

IMMIGRATION911, LLC (C00495259)

Additional Disbursements by Line Number

2011 Year-End Report/Amended 2011 Year-End Report

Report Line	2011 Year-End Report (Image 12970137819)	Amended 2011 Year- End Report, received 5/30/12 (Image 12971256071)	Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$0.00	\$96,551.33	\$96,551.33
Total Variance:			\$96,551.33

2012 April Quarterly Report/Amended 2012 April Quarterly Report

Report Line	2012 April Quarterly Report (Image 12971114616)	Amended 2012 April Quarterly Report, received 5/30/12 (Image 12971256039)	Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$38,110.65	\$45,445.40	\$7,334.75
Total Variance:			\$7,334.75